



September 15, 2011

VIA ECFS

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Stephanie A. Joyce**

Attorney  
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Re: WC Docket No. 09-144, *Securus Petition for Declaratory Ruling*

Dear Ms. Dortch:

Securus Technologies, Inc. (“Securus”) hereby updates the record in this proceeding with respect to an issue it addressed in its letter dated August 2, 2011 (“Securus August 2 Letter”). Specifically, Securus informs the Commission of recent information regarding the question whether the Federal Bureau of Prisons (“FBOP”) is blocking calls diverted from its sites by Millicorp via the arrangement it calls ConsCallHome.

Securus previously informed the Commission that the FBOP blocks all call-diversion attempts, including those of ConsCallHome, on the ground that they are “simply a means of call forwarding.” Securus August 2 Letter at 8; *see also* Letter from Stephanie A. Joyce to Marlene H. Dortch, Secretary, FCC, at 7 (Feb. 16, 2010). The undersigned counsel had been told this information in February 2010 by an employee of the FBOP. *Id.* Securus has supplied the Commission with copies of FBOP telephone regulations which include a prohibition on “call forwarding, including automatic electronic forwarding or any similar telephone function.” U.S. Dept. of Justice, Federal Bureau of Prisons, Program Statement P.5624.08, p. 5 (appended to Letter from Stephanie A. Joyce to Marlene H. Dortch, Secretary, FCC (Aug. 10, 2011)).

It has come to Securus’s attention that the FBOP is no longer blocking ConsCallHome diverted calls, having entered into an arrangement specifically with Millicorp. The arrangement was established directly between the FBOP and Millicorp. Securus has not been able to obtain any documents regarding this arrangement. The undersigned counsel was told, however, that call-diversion attempts by other entities continue to be blocked, and that the FBOP maintains its policy that any call for which it cannot identify the called party will be blocked.

Securus notes that the FBOP made this arrangement in its own discretion as the agency authorized to set inmate telephone policy for federal prisons. As the Commission is aware, the correctional authorities which Securus serves have requested that all call-diversion attempts be

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blocked. Securus Petition for Declaratory Ruling at 2 & Exs. 18-28 (July 29, 2009); Securus August 2 Letter at 2. To the best of Securus's knowledge, Millicorp has not approached any of those correctional authorities to request that they change their policy or otherwise permit ConsCallHome to divert calls.

Please do not hesitate to contact me with any additional questions or concerns: 202.857.6081. Thank you for your consideration.

Sincerely,

s/Stephanie A. Joyce

*Counsel for Securus Technologies, Inc.*

cc: Chairman Julius Genachowski (*via electronic mail*)  
Commissioner Michael Copps (*via electronic mail*)  
Commissioner Robert McDowell (*via electronic mail*)  
Commissioner Mignon Clyburn (*via electronic mail*)  
Sharon Gillett, Chief, Wireline Competition Bureau (*via electronic mail*)  
Austin Schlick, General Counsel (*via electronic mail*)  
Zachary Katz, Legal Advisor to Chairman Genachowski (*via electronic mail*)  
Margaret McCarthy, Policy Advisor to Commissioner Copps (*via electronic mail*)  
Christine Kurth, Legal Advisor to Commissioner McDowell (*via electronic mail*)  
Angela Kronenberg, Legal Advisor to Commissioner Clyburn (*via electronic mail*)  
Albert Lewis, Chief, Pricing Policy Division, Wireline Competition Bureau (*via electronic mail*)  
Julie Veach, Associate General Counsel (*via electronic mail*)  
Diane Griffin Holland, Assistant General Counsel (*via electronic mail*)  
Trent Harkrader, Deputy Chief, Investigations and Hearings Division, Enforcement Bureau (*via electronic mail*)  
Marcus Maher, Legal Advisor to Chief of the Wireline Competition Bureau (*via electronic mail*)  
Pamela Arluk, Assistant Chief, Pricing Policy Division, Wireline Competition Bureau (*via electronic mail*)  
Lynne Hewitt Engledow, Pricing Policy Division, Wireline Competition Bureau (*via electronic mail*)  
Michelle Berlove, Pricing Policy Division, Wireline Competition Bureau (*via electronic mail*)  
Jennifer Prime, Acting Legal Advisor, Office of the Bureau Chief, Wireline Competition Bureau (*via electronic mail*)  
Chin Yoo, Investigations and Hearings Division, Enforcement Bureau (*via electronic mail*)